

S E C R E T

19 NOV 1980

MEMORANDUM FOR: Deputy Director for Operations

FROM : [REDACTED]
Chief, Latin America Division

SUBJECT : Request for Approval to Use Travel Agents

REFERENCE : Comptroller General Circular B-103315, 20 August 1979

1. For reasons outlined below, it is hereby requested that approval be granted to use travel agents for the purchase of airfares by [REDACTED] personnel on official travel.

2. Attached is a copy of referenced document which represents a willingness by the Comptroller General to permit the use of travel agents by the U.S. Government in lieu of direct purchase of airfare from the carriers when it can be demonstrated that such use is economical and efficient. Such permission may also be granted in situations where an Agency wishes to test the hypothesis that efficiency and economy could be demonstrated through the use of travel agents. Current Agency practice is governed by [REDACTED] which prohibits the use of travel agents within the [REDACTED]

3. With consideration of the Comptroller General's position, Latin America Division believes that [REDACTED] should be authorized to use travel agents for the following reasons:

A. Efficiency and Economy: The Station's operational personnel -- primarily [REDACTED] officers -- spend almost fifty percent of their time traveling throughout [REDACTED] averaging four trips per month per officer. In order to comply with the requirement that travel be arranged through the carrier, each trip must be preceded by a three-hour, round trip to [REDACTED] where the traveler must stand in the advance travel line for generally a minimum of one hour. This administrative bottleneck requires an average of twenty percent of each officer's time away from the Station, which otherwise would be spent on operational or other official business. During the high tourist season in the [REDACTED] an officer's down time is significantly increased by having to utilize these procedures. If use of a travel agent were

S E C R E T

-2-

permitted, the traveler could set up the entire trip by [] phone, have the arrangements confirmed, and subsequently visit the travel agent to pay for and pickup the tickets. Maximum time for this approach is estimated at one-half hour.

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4. It should be noted that the forthcoming relocation of [] will not significantly affect the time involved in obtaining tickets at the airport. The usual one hour wait in line, obviously won't be reduced. The round-trip travel will be cut from three to two hours. This would continue to represent a less than efficient use of an operations officer's time.

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5. To summarize the above, the considerations which suggest the advisability of using travel agents are both operational and economical. Valuable time will be saved at a time when the demands placed upon [] are growing while personnel resources are essentially standing still. A random use of the many travel agents in the [] area would also enhance the cover of our operational travelers who must, under the current policy, take all of their business to the same people.

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S E C R E T

S E C R E T

-3-

6. It is recognized that approval by the Comptroller General to use travel agents -- if granted -- would cover the entire Agency. While such a change in policy may have merit, our concern at this time focuses only on the needs of [redacted] Accordingly approval for the use of travel agents by [redacted] only is hereby requested. If this can be accomplished internally on the basis of the operational justifications, such action is hereby requested. If external approval of the Comptroller General is needed on the basis of economy to accomplish this objective, we believe that sufficient justification is contained herein.

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Attachment: As Stated

APPROVED:

John H. Stein

19 NOV 1980

Deputy Director for Operations

Date

ORIG: DDO/LA/SS/[redacted]

DISTRIBUTION:

- 1 - DDO (original to be returned to C/LA/SS) w/att.h/w
- 1 - ADDO w/att. h/w
- 1 - Central Cover Staff w/att. h/w
- 2 - C/LA w/att. h/w
- 1 - LA/[redacted] w/att. h/w
- 1 - LA/B&F w/att. h/w
- 1 - LA/Supervisor w/att. h/w
- 1 - C/LA/SS w/att. h/w



B-103315

August 20, 1979

HEADS OF ALL DEPARTMENTS, AGENCIES, AND OTHERS CONCERNED

SUBJECT: INDIVIDUAL AGENCIES MAY REQUEST GAO TO
LIFT ITS PROHIBITION ON THE USE OF
COMMERCIAL TRAVEL AGENTS FOR GOVERNMENT
TRAVEL

At the request of the Chairman, Subcommittee on Special Small Business Problems, House Committee on Small Business, GAO recently took an indepth look at its prohibition on using commercial travel agents in the procurement of official travel for Government employees. In a report dated August 8, 1978 (LCD 78-219), we said that the information developed during our review was inconclusive as to whether or not a change in the prohibition was warranted. After evaluating the advantages and disadvantages, we took the position that we would not object to lifting the prohibition on an individual agency basis if any agency could show that such action would result in a more efficient and less costly operation. After hearings on the matter, the Subcommittee recommended that GAO remove its ban on the use of travel agents. (House Report No. 96-339 dated July 16, 1979)

In considering the Subcommittee's recommendation, we once again reviewed the justification for the ban over the years. We found that most of the concerns which supported the prohibition on the use of commercial travel agents have not been resolved. Given the long-standing policy against the use of travel agents for Government travel and the reasons underlying the policy, we advised the Subcommittee that GAO does not believe it is appropriate to lift the prohibition at this time. We said that we will, however, consider agency plans for the use of travel agents on the basis of analyses that adequately demonstrate economies to be achieved or to test the use of travel agents for the purpose of demonstrating whether savings and efficiencies will result.

This circular sets forth specific procedures and requirements for submitting proposals for exemption to GAO's

restriction on using such agents. (4 C.F.R. 52.3 (1978)). Requests for exemption to the restriction should be presented by the head of the agency, or his designee.

The requesting agency will have to provide reasonable evidence that granting an exemption to permit use of travel agents will result in a more efficient and less costly travel operation. The agency concerned must weigh the broader implications of its proposal. For example, it must consider administrative problems concerning oversight of the travel agents utilized, such as allocating the business; obtaining refunds; processing an increased number of bills; and ascertaining the financial condition, stability and capability of the travel agents.

Specifically, the agency should include in its proposal to GAO:

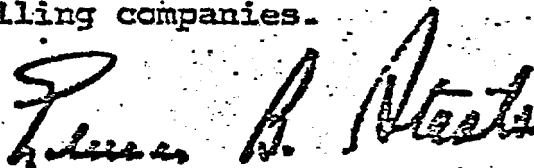
- Details of how its plan will work, i.e., how agents will be selected, to whom the Government Transportation Request will be drawn, how frequently the agents will bill, and just what services the agent has pledged.
- Estimates of the volume of sales to be handled by travel agents and the number of agents to be employed.
- The estimated one-time and recurring costs of the plan to include overhead and any indirect costs associated with using travel agents.
- The projected savings (personnel and otherwise) on a one-time and recurring basis.
- The period desired to test the plan.

Any proposed test should be properly designed to develop the information required to support a decision on whether or not the ban should be lifted on a permanent basis. Also, any proposal should be reviewed by the agency's legal staff to insure that implementation or

B-103315

operation of the plan does not violate any Federal travel or procurement law and that compliance with all Federal travel regulations and laws is assured.

In evaluating each proposal, GAO will be measuring the impact of any requested change in procurement procedures, not only on the operation of the requesting agency, but also on other affected Government agencies. For example, the decision to use travel agents may significantly increase the audit and administrative workload of the General Services Administration since it might be required to audit many more transactions and do business with many more billing companies.



Comptroller General
of the United States

1. THE AGENCY REGULATORY SYSTEM

a. GENERAL

- (1) The Agency regulatory system consists of regulations, notices, and handbooks. These issuances prescribe policies and procedures essential to the control and direction of Agency activities.
- (2) The development of regulatory issuances is a cooperative effort that requires accurate staff work by initiators and coordinators and prompt resolution of differences. Whenever feasible, initiators and coordinators are expected to resolve differences through personal meetings to avoid delays and repetitious preparation of paperwork.
- (3) Agency coordinators include the Office of the Director, the Deputy Directors, the General Counsel, the Inspector General, the Comptroller, and the Legislative Counsel. Regulatory proposals generally will be sent to the coordinators for comment and suggestions.
- (4) The General Counsel or his designee will review all Agency regulatory materials and proposals, in whatever form, for their legality.

b. TYPE OF ISSUANCES. The types of issuances are:

- (1) Headquarters [] which are the basic medium for prescribing directives of a continuing nature. They prescribe policy, establish organization, delegate authority, and assign responsibilities.
- (2) Headquarters [] which are used to disseminate transitory information. They will not be used as the basic medium to convey permanent directives.
- (3) Headquarters [] which supplement regulations by providing the detailed procedures necessary to carry out Agency policies.

c. RESPONSIBILITIES AND PROCEDURES

- (1) The Deputy Director for Administration is responsible for the administration of the Agency regulatory system. He determines the extent to which regulatory proposals are coordinated and establishes the time limits within which coordination is to be completed.
- (2) The component initiating a regulatory proposal is responsible for obtaining the comments of other components within the same directorate having related or interdependent responsibilities and functions, or whose activities or personnel are substantially affected thereby, before submitting the proposal to the Regulations Control Branch (RCB) for processing.
- (3) The Regulations Control Branch is responsible for processing regulatory proposals, establishing and maintaining editorial standards, and initiating regulatory proposals as appropriate. When coordination is required, RCB will forward regulatory proposals to the appropriate Agency coordinators requesting comments within time limits not to exceed 30 calendar days. Coordinators will make every effort to respond within the established time limits, but may request an extension up to the 30 day limit. Comments submitted by coordinators after the 30 day limit will not be considered unless a request for further extension has been submitted in writing to the Deputy Director for Administration by the Deputy Director or Head of Independent Office concerned.

— Revised: 27 February 1976 (922)

Declassified: 27 February 1976 (922)

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- (4) When requested by the Regulations Control Branch, coordinators will identify the component(s) generating comments so that RCB may bring together the initiator and commenting component(s) for the resolution of differences.
- (5) Within 20 calendar days after expiration of the time limit for receiving coordinator comments, the Regulations Control Branch will prepare a final version of the proposal for distribution to the coordinators and will notify the coordinators that this version will be forwarded for approval.
- (6) A coordinator who does not concur in the final version of a regulatory proposal may request the Deputy Director of Central Intelligence to review the proposal by submitting a memorandum of nonconcurrence through the Regulations Control Branch to the DDCI within 10 calendar days of receipt of the final version. The DDCI will resolve the differences and notify RCB.

d. APPROVAL. Agency regulatory issuances are published only upon approval by the Director of Central Intelligence or by the Deputy Director for Administration for headquarters issuances and the Deputy Director for Operations for field issuances. As set forth in

- r Agency regulations are issued pursuant to the authorities of the National Security Act of 1947, as amended (50 U.S.C. 401-403); the Central Intelligence Agency Act of 1949, as amended (50 U.S.C. 403a-j); Executive Order 12036; and other pertinent legislation and orders. When appropriate justification is submitted to the Deputy Director for Administration, and if he determines that the best interests of the Government are so served, the Deputy Director for Administration may approve exceptions to those normal administrative regulations that are not based upon statutory requirements or that do not require the approval of the Director.
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